

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking Regarding Policies,  
Procedures and Rules for the Low Income Energy  
Efficiency Programs of California's Energy Utilities.

Rulemaking 07-01-042  
(Filed January 25, 2007)

Southern California Edison Company's (U 338-E)  
Application for Approval of SCE's "Change a Light,  
Change the World," Compact Fluorescent Lamp  
Program.

Application 07-05-010  
(Filed May 10, 2007)

**JOINT COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY AND  
SOUTHERN CALIFORNIA GAS COMPANY ON THE ADMINISTRATIVE LAW  
JUDGE'S RULING SEEKING COMMENTS ON ISSUES RAISED IN THE KEMA  
REPORT AND ON NATURAL GAS APPLIANCES TESTING ISSUES**

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October 16, 2007

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**I. Introduction**

Pursuant to the September 27, 2007 *Administrative Law Judge's Rulings Seeking Comments on Issues Raised in the KEMA Report and on Natural Gas Appliance Testing Issues* (ALJ Ruling),<sup>1</sup> San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) (collectively referred to as the Joint Utilities) file these joint comments.

In the ALJ Ruling, Administrative Law Judge (ALJ) Malcolm asked parties to provide comments regarding how Low Income Energy Efficiency (LIEE) programs might address issues raised by KEMA in its September 7, 2007 report entitled "Final Report on Phase 2 Low Income Needs Assessment" (KEMA Report). The ALJ Ruling also sought parties' comments on possible modifications to the Natural Gas Appliance Testing (NGAT) program,<sup>2</sup> as well as comments on the KEMA Report.

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<sup>1</sup> As modified by the October 3, 2007 ALJ Ruling granting motions filed by Association of California Community Energy Services (ACCES) and A World Institute for Sustainable Humanity (AWISH) to extend the due date to October 16, 2007 for filing Opening Comments on the above referenced Ruling and ALJ Malcolm's Ruling dated September 14, 2007, Seeking Responses to Questions on LIEE Furnace Programs and Natural Gas Appliance Testing. The October 3, 2007 Ruling also extended the due date for Replies for both Rulings until October 23, 2007.

<sup>2</sup> The Joint Utilities are submitting responses to questions on the furnace program and NGAT in a separate October 16, 2007 filing, and, therefore, have not included any comments pertaining to Attachment B to the Ruling in this response.

The Joint Utilities applaud the Commission for its re-evaluation of the LIEE programs and its desire to ensure that the LIEE program, and California Alternate Rates for Energy (CARE) program, are meeting the needs of eligible low income utility customers and appreciate the opportunity to provide the Commission with these comments.

## **II. Summary**

### **Comments on KEMA Report**

SDG&E and SoCalGas have evaluated the KEMA Report and completed additional work on some of the report's findings. Having found data inconsistencies, and where those inconsistencies exist, the Joint Utilities recommend that the findings in the KEMA Report not be used until additional work is completed to determine the most accurate and appropriate information to use for future program planning. The Joint Utilities' comments on the KEMA Report address the following areas:

Sampling and Survey Implementation – The sample size for SDG&E was both too small and not representative of the low-income population. In addition, there are inconsistencies between KEMA survey results and other utility, census, and program information.

Analysis and Ultimate Use of Survey Data – The Joint Utilities have concerns with the way the survey data was interpreted and have done additional analyses that result in different conclusions. For example, KEMA's determination of "Technically Eligible for LIEE" is overstated since it does not take into account the fact that newer homes (10 years or younger) are not eligible for the program.

Determination of a Target for CARE or LIEE Participation – The Joint Utilities believe that the most serious problem with the KEMA report is the manner in which the target for CARE participation was determined. The approach appears to be unscientific, ignores important information regarding respondents' attitudes, and is not transparent.

Given the importance of determining appropriate and achievable CARE targets, we recommend against using the CARE targets determined by KEMA and an alternative approach to developing targets that can be used for CARE and LIEE:

- A workshop on the KEMA Report results to determine how to use the report information along with additional data and analyses to determine the most accurate information for future program planning.
- A long-term strategy that retains the goal of 100% of all eligible customers who are willing to participate, which considers LIEE housing stock eligibility.
- The pursuit of the long-term goal through a prioritization approach that first targets customers with the greatest need and a high probability of willingness to participate. As time passes, develop additional strategies to reach other customers based on a ranking approach.

### **Response to Questions in the ALJ Ruling**

The responses of SDG&E and SoCalGas to the questions include discussions of the following general areas:

1. Concerns with certain conclusions reached in the KEMA Report, particularly since the sample size for SDG&E was so low. Some of the KEMA results also are inconsistent with other utility and program data.
2. Proposals for changes to the LIEE program to address issues raised and to support the Commission's proposed goal regarding energy efficiency, consistent with SDG&E and SoCalGas' proposed design considerations for the LIEE program, including:
  - a. An energy audit for each customer to identify the most cost-effective opportunities for energy savings;
  - b. Installation of only measures that are ranked to provide the greatest energy savings; and,
  - c. An education component to address the operation of new energy efficient equipment and behavioral changes to save energy.

3. Continued development of strategies and efforts directed at LIEE and CARE outreach, including evaluation of existing outreach methods and development of new methods, particularly targeted to hard-to-reach customers.

### **III. Joint Utilities' Comments on the KEMA Report**

#### **Introduction and Background**

SDG&E and SoCalGas offer the following comments on the KEMA Report. In general, the KEMA Report does a sufficient job of identifying the issues and attempting to provide conclusions and recommendations. Unfortunately, and in particular to Southern California, some of the conclusions in the KEMA Report are based on a very small sample size and some incorrect data, causing these conclusions to be inconsistent with utility information, especially with respect to actual activities in the LIEE program and customer satisfaction survey results. Where these inconsistencies exist, SDG&E and SoCalGas recommend that the conclusions in the KEMA Report not be used for future program planning, but rather that additional work be completed to determine the most accurate data to use in developing future program recommendations.

In these comments, the Joint Utilities provide information on those major conclusions and recommendations in the KEMA Report with which the Joint Utilities have the most concerns and which the Joint Utilities believe should not be utilized for future planning at this time. In some cases, SDG&E and SoCalGas have performed work that provides different findings from those in the KEMA Report. This work is summarized in these comments, and SDG&E and SoCalGas are willing to provide full analyses if needed.

In the fourth quarter of 2006, SDG&E and SoCalGas reviewed the Draft KEMA Report and also performed independent verification of some of KEMA's findings. In February 2007, SDG&E and SoCalGas met with Energy Division Staff and KEMA's project manager to discuss the report and the additional work performed by SDG&E/SoCalGas' consultants. At that time, the data from the KEMA Report had not been provided to the utilities. In June 2007, SDG&E and SoCalGas were provided the survey data collected during the Needs Assessment.

Over the course of the preceding year, SDG&E and SoCalGas identified a number of concerns with the Needs Assessment. These concerns have been organized into the following categories: (1) sampling and survey implementation; (2) analysis and ultimate use of the survey data; and (3) determination of a target for CARE and/or LIEE participation. Each of these categories is addressed below, followed by Alternative Recommendations proposed by the Joint Utilities.

### **Sampling and Survey Implementation**

The sample size KEMA used for SDG&E's service territory was both too small and not representative of the low-income population. During the February 2007 meeting, KEMA agreed that the sample size of 130 customers in the SDG&E service territory was insufficient and that it would be much better if the sample size were more in-line with the other utilities (PG&E = 462, SCE = 160, SCE/SCG = 489/ SCG = 294). This implies that the KEMA Report conclusions, as applied to SDG&E, are likely inappropriate and that comparisons across utilities also may be inappropriate and inapposite. That is, breaking down the sample to sub-groups (e.g., breaking the data into utility specific subgroups for comparison purposes) may not be appropriate due to limitations of the sample's representative power, especially given the small sample size KEMA used for the SDG&E service area.

In order to examine the representativeness of the SDG&E sample, SDG&E compiled Table 1 below, which compares the characteristics of the survey respondents with data from the 2000 Census five percent PUMS and actual CARE and LIEE participation. As is evident in the table, the characteristics of the KEMA survey respondents are not representative of the low income population in the SDG&E service territory. The KEMA Report over-samples African-Americans (13% of survey respondents were found to be African-American, whereas only 6% of SDG&E low income households are African-American according to the 2000 census) and households with relatively advanced education (54% of survey respondents have at least "some college," whereas only 45% of SDG&E low income households has at least "some college"), and under-samples households with relatively low incomes (49% of survey respondents have incomes below \$20,000, whereas 62% SDG&E low-income households

have incomes below \$20,000). These latter two comparisons are also relevant for SoCalGas. The following additional examples (not shown in the Table 1) help to clarify this point.

- First, the KEMA Report in Table 1-2, on page 1-4, shows the respective CARE penetration rates across utilities as: PG&E (71%), SCE (78%), SCG (72%) and SDG&E (66%). However, the self-reported survey data shows CARE penetration rates as: PG&E (30%), SCE (40%), SCG (25%) and SDG&E (22%). If the KEMA sample is adjusted to account for only customers aware of the program the penetration rates become PG&E (49%), SCE (70%), SCG (67%) and SDG&E (45%). In either case, it does not seem that the sample was drawn from the correct population.
- Second, the survey was supposed to be of “low income” households only. Yet, using the survey data provided by KEMA, the Joint Utilities estimate that 11% of the customers would not be eligible to participate in either the CARE or LIEE programs due to excessive income.
- Third, the Joint Utilities find fault with the KEMA Report’s claim regarding the percentage of homes that need ceiling insulation. In Table 5-21, the KEMA Report states that 35% of its sample of 1,295 (of the total 1,534) needs ceiling insulation. While the Joint Utilities are unconvinced that the rate really is 30% ( $1295/1534 \times 35\%$ ), SDG&E and SoCalGas do have program data showing that since 2004, only 3% of the homes treated by SDG&E’s LIEE program required ceiling insulation, and that only 4% of the homes treated by SoCalGas required ceiling insulation.
- Fourth, the KEMA Report’s comparison of LIEE participants with non-participants may not be valid because there were only 93 total LIEE participants in the sample (6 SDG&E, 9 SoCalGas, 7 SCE, 22 SCE & SoCalGas, and 49 PG&E). The Joint Utilities also note that the LIEE participation was skewed towards Northern California. Because the interests and needs of LIEE participants and non-participants differ so drastically, SDG&E and SoCalGas believe that any comparisons between participants and non-participants will lack meaningful statistical significance.

**Table 1**  
**Comparison of KEMA Sample with 200Census<sup>1</sup>**

Variable	All of California		SDGE Service Area		SCG Service Area	
	2000 Census Obs = 165,532	KEMA Obs = 1,517	2000 Census Obs = 13,790	KEMA Obs = 123	2000 Census Obs = 96,166	KEMA Obs = 403
<i>Race</i>						
Fraction White (non-Hispanic)	0.40	0.31	0.49	0.43	0.32	0.26
Fraction African American	0.08	0.10	0.06	0.13	0.09	0.10
Fraction Asian	0.09	0.09	0.07	0.05	0.08	0.12
Fraction Hispanic	0.38	0.42	0.33	0.37	0.48	0.44
Fraction Other Race	0.04	0.07	0.05	0.02	0.03	0.08
<i>Educational Attainment</i>						
Fraction Bachelor's Degree or Higher	0.11	0.15	0.14	0.15	0.10	0.23
Fraction Some College	0.26	0.29	0.31	0.39	0.23	0.27
Fraction High School Degree Only	0.23	0.26	0.23	0.15	0.22	0.19
Fraction Less than High School Degree	0.41	0.30	0.31	0.31	0.45	0.31
<i>Income</i>						
Fraction H.H. Income Less than \$10,000	0.25	0.16	0.23	0.14	0.24	0.15
Fraction H.H. Income \$10,000 to \$19,999	0.37	0.35	0.39	0.35	0.36	0.34
Fraction H.H. Income \$20,000 to \$29,999	0.19	0.28	0.19	0.28	0.20	0.33
Fraction H.H. Income \$30,000 to \$39,999	0.10	0.13	0.11	0.17	0.11	0.13
Fraction H.H. Income \$40,000 or higher	0.08	0.08	0.08	0.06	0.09	0.05
<i>Linguistic Isolation</i>						
Fraction Linguistically Isolated	0.20	0.20	0.15	0.16	0.24	0.16
Fraction Spanish Language Isolated	0.14	0.13	0.11	0.10	0.18	0.12
Fraction Asian Language Isolated	0.04	0.01	0.03	0.00	0.04	0.01
<i>Home Ownership</i>						
Fraction Renter	0.64	0.66	0.66	0.69	0.65	0.79
Fraction Owner	0.34	0.34	0.31	0.31	0.33	0.21

1. Figures validated using 2005 American Community Survey data update to the 2000 Census



## **Analysis and Ultimate Use of the Survey Data**

In spite of the concerns listed above, the Joint Utilities believe that there is a significant amount of useful information included in the KEMA Report. For example, the eligible percentages/customers for SDG&E and SoCalGas are very reasonable and consistent with data provided by the US Census for 2000 and the annual updates to the Census information. The Joint Utilities also believe that KEMA Report's analysis of customers' attitudes relating to program awareness, perceptions, and attitudes are probably valid, especially at the statewide level where the sample size is largest.

However, the Joint Utilities have serious concerns with the manner in which the survey data was analyzed and interpreted. For example, the analysis provided only hints at possible correlations between variables (e.g., households with children are more likely to participate in CARE). The analysis does not address the statistical significance of these relationships nor is there an explicit evaluation of causality between any two variables. There are no hypotheses offered, no predictive model estimated, no hypotheses tests performed, no confidence levels estimated, and no real analysis that links one variable to another. An alternative approach would have included the estimation of predictive or causal models of participation for CARE and LIEE, with focus on causality, significance, and confidence.

As stated above, in June 2007, SDG&E and SoCalGas were provided the survey data collected during the Needs Assessment. SDG&E and SoCalGas analyzed the data, developed a predictive model, and found interesting results, some of which are inconsistent with KEMA's interpretations. The predictive model allows for an: (1) assessment of the relative importance of individual characteristics; (2) the effect of changing the significant drivers of participation; and (3) determining the order in which the programs should be marketed to produce the largest changes in participation. None of these tasks can be accomplished using association or correlation, the preferred method of the Needs Assessment.

Regarding the manner in which the survey data is interpreted, the Joint Utilities have additional concerns. For example, the KEMA Report's use of the term "Technically Eligible for LIEE" was misleading because it did not account for program requirements adopted by the Commission. In particular, newer homes (10 years and younger) are

basically ineligible since most of the measures would not qualify for retrofit, and newer Title 24 standards require energy efficiency in the design and construction. For SDG&E, these newer homes represent approximately 15% of what the KEMA Report considers "Technically Eligible," for SoCalGas newer homes represent approximately 12%.

Furthermore, the metric used to determine the potential for refrigerator replacement is incorrect. The KEMA Report uses a 10-year age threshold, while the LIEE program requires that a unit be manufactured prior to 1993. Therefore, the Joint Utilities believe that the potential savings from refrigerators indicated in the KEMA Report may be overstated.

### **Determination of a Target for CARE or LIEE Participation**

The Joint Utilities believe that the most egregious problem with the KEMA Report is the manner in which KEMA determined the target for CARE participation. In the meeting with the Energy Division and KEMA in February 2007, SDG&E and SoCalGas expressed concerns that the manner in which the recommended CARE target percentage was computed was not transparent. It seems that the targets are based on the answer to one survey question (... would you be willing to participate...) with a small ad hoc adjustment for possible barriers to participation. For example, SDG&E's initial target of 91% was adjusted downward to 85%. However, this relatively simple method does not consider the inconsistency between a series of attitude questions (see Table 5-43, page 5-62 of the KEMA Report) and the willingness to participate question.

KEMA's approach completely ignores important information regarding respondent's attitudes, which, to a large degree, determine ultimate participation. For example, a specific aspect of welfare stigma ("Someone else in this household is against participating...") is in direct conflict to the willingness to participate question. Further, this one stigma aspect almost perfectly predicts non-participation. That is, 94% of survey participants in the SDG&E service territory who strongly agree with the statement do not participate in the program. An alternative to KEMA's approach would include the information contained in the attitude questions in a predictive model to determine significance and causality. This would allow the researcher to quantitatively adjust the participation estimate for attitude/perception issues and to determine the

attitudes/perceptions that need to be addressed through marketing of the program. The Joint Utilities' preliminary results, based on a predictive model, indicate that the CARE targets provided in the KEMA Report are not achievable because of welfare stigma, fear or distrust, or process issues. Given the importance of determining appropriate and achievable CARE targets, SDG&E and SoCalGas recommend that the Commission not use the CARE targets contained in the KEMA Report, but instead develop new targets based on additional analyses.

### **Alternative Recommendations**

Based on findings in the KEMA Report and the Joint Utilities' own analysis, SDG&E and SoCalGas offer two recommendations. First, the Commission should schedule a workshop to discuss the KEMA Report survey results, the corresponding analysis, and interpretation of the results. The goal of this workshop should be to determine how to use the information in the KEMA Report along with additional data to determine the most accurate information to be used for future program planning.

Second, the Joint Utilities believe that the best long-term strategy is to retain the goal of 100% of all eligible customers who are willing to participate, taking into consideration the housing stock eligibility for the LIEE program. However, the utilities should not be asked to achieve this objective immediately. Rather, the Joint Utilities recommend that, through the use of a predictive/causal model, customer groups should be rank ordered in terms of their need and likely willingness to participate. Marketing and outreach efforts should be focused on these customer groups over time in accordance with that established rank order.

In the near term, the plan should be to target customers that have the highest need and a high probability of willingness to participate. For example, the KEMA Report suggests that the program should not expand efforts to enroll low income households comprised of young adults (page 7-29). If this result holds up in the predictive modeling, then the programs would not consider marketing efforts to reach this group in the short-term. On the other hand, it may be that there should be an added focus on customers with more energy/bill savings opportunities (e.g., larger households). In addition, the utilities' research, using the KEMA study data and census data, indicates that households where

only Spanish is spoken present a real--but not insurmountable challenge--that can be the focus in the near to intermediate term. In the long-term, as new technologies develop, the programs can re-visit homes that were recently treated under the LIEE program and homes built during the late 1990s to early 2000s. Since both the CARE and LIEE programs work together the Joint Utilities believe that this approach can be employed for both programs.

#### **IV. Joint Utilities' Comments to Specific Questions Posed in the ALJ Ruling**

##### **1) What strategies would achieve higher participation in areas where there do not appear to be any unique challenges to expanding participation?**

SDG&E and SoCalGas believe that the continued assessment of existing outreach efforts and methods used by the utilities' program management, combined with the evaluation and introduction of new methods of outreach, is the best strategy to use in expanding participation in the LIEE program.

Both utilities have been very successful in enrolling customers in their LIEE programs by utilizing several different outreach methods. Methods used include, but are not limited to:

- Door-to-door canvassing in neighborhoods known to have high saturation levels of low income customers;
- Direct mail to customers enrolled in the California Alternative Rates for Energy (CARE) program;
- Direct mail to residences where CARE-enrolled customers formerly lived;
- Telemarketing;
- Use of self certification of customers in targeted areas; Community outreach events; and,
- Partnering with local government agencies and community based organizations (CBOs).

SDG&E and SoCalGas address the challenges to enrollment through a strategy of conducting ongoing evaluations of the outreach methods used in the LIEE program and instituting modifications when warranted. Additionally, SDG&E and SoCalGas

continually are assessing new outreach methods as part of their strategy to increase participation in LIEE. When warranted, the utilities introduce new methods to achieve the highest number of enrollments in the LIEE program at the lowest cost possible. For example, new outreach methods which are being developed and/or have been recently implemented include:

- A web-based form which both customers and community agencies can use to initiate an application for the LIEE program;
- A dedicated email address that both customers and agencies can use to notify SDG&E of their interest in the LIEE program;
- Use of customer information from those customers using web-based utility services (My Account) to target customers in low-income designated areas with email messaging regarding the LIEE program; and,
- Contracting with new community agencies at SDG&E and SoCalGas to perform outreach-only services.

In areas where there does not appear to be any unique challenges, SDG&E and SoCalGas will continue with their strategy to evaluate current efforts and introduce innovative methods to successfully enroll customers. SDG&E and SoCalGas will also evaluate and assess new methods of outreach to address the more challenging populations and geographic areas in their service territories.

**2) Should the LIEE program target specific types of households, e.g., African-American households or large households? If so, what strategies should the utilities use to target identified households?**

SDG&E and SoCalGas do not believe households should be targeted by ethnic group or household size. Contrary to the findings in the KEMA Report, SDG&E's LIEE program has reached various ethnic groups at a penetration rate that is commensurate to or greater than the rate of actual ethnic groups in the low income population, as reflected in recent census track data. For example, over the past 15 years, approximately 9% of the 150,000 LIEE program participants who reported their ethnic background reported that they are of African-American heritage. Based on the Public Use Microdata Samples

(PUMS) data, 6.4% of SDG&E's low income residential population is estimated to be African-American.

Of the 210,000 plus customers served in SoCalGas' LIEE program between 2002 and today, 8.6% were African-American. Based on the PUMS data, 8.7% of SoCalGas' low income population is African-American. In fact, data comparing 1990 and 2000 U.S.Census findings, along with Claritas<sup>3</sup> research estimates for 2006, shows that both the Hispanic and Asian populations are growing in both utilities' service territories relative to the total population, while the African-American and white populations are decreasing.

**Table 2**  
**Comparison of Race & Ethnicity Over Time**

SoCalGas	1990 U.S. Census		2000 U.S. Census		2006 Claritas Estimates	
	Number	Percent	Number	Percent	Number	Percent
<b>Race &amp; Ethnicity</b>						
American Indian & Alaska Native	106,049	0.60%	182,572	1.00%	209,442	1.00%
Asian or Pacific Islander	1,387,086	8.20%	1,880,525	9.80%	2,218,801	10.60%
Black or African American	1,283,759	7.60%	1,363,594	7.10%	1,421,204	6.80%
Some other Race	2,810,835	16.70%	4,081,322	21.30%	4,799,421	22.90%
White	10,652,529	63.20%	10,723,149	56.10%	11,271,054	53.90%
Two or more Races	611,701	3.60%	889,406	4.70%	997,852	4.80%
Hispanic Origin (of any race)	5,522,248	32.80%	7,727,148	40.40%	9,086,813	43.40%
<b>SDG&amp;E</b>						
<b>Race &amp; Ethnicity</b>						
American Indian & Alaska Native	19,918	0.70%	26,374	0.80%	27,263	0.80%
Asian or Pacific Islander	199,447	7.00%	291,294	8.90%	343,518	9.90%
Black or African American	154,622	5.50%	166,709	5.10%	160,559	4.60%
Some other Race	245,886	8.70%	382,929	11.70%	450,838	13.00%
White	2,111,780	74.60%	2,224,320	69.00%	2,317,461	66.70%
Two or more Races	98,724	3.50%	147,138	4.50%	176,086	5.10%
Hispanic Origin (of any race)	544,927	19.30%	812,868	24.80%	964,097	27.70%

Finally, both utilities believe that any targeting by ethnic group may be interpreted as discriminatory and stigmatizing.

SDG&E and SoCalGas believe that the LIEE program should target customers based on their energy consumption and/or location within certain climate zones in order to reach households with the greatest potential for energy and bill savings. High consumption in

<sup>3</sup> Claritas Inc., "2006 Combined Data Update," iMARK Licensed Material, March 2007.

homes with low occupancy and/or low square footage may provide the greatest potential for savings. Furthermore, high consumption in certain climate zones may indicate the presence of a less efficient air conditioner or forced air heater. SDG&E and SoCalGas recommend this type of targeting to achieve the program's goal of providing low income customers with energy savings. Combined with this targeting approach, SDG&E and SoCalGas believe that a pre-installation home energy audit approach will yield the greatest benefits to their customers. Targeting only those areas that will truly provide energy savings to the low income customer supports the Commission's goal of achieving energy savings from the LIEE programs and also maximizes the use of the limited funds available. Targeting based on consumption and household size can be achieved using available utility data.

**3) Should the LIEE program target households in specific geographic areas (remote areas, densely populated areas, hot climate areas)? If so, what strategies can be employed to target such areas?**

As discussed in the response to Q. 2. above, SDG&E and SoCalGas believe the best strategy to target eligible households for the LIEE program and provide the most benefits to customers is to use data on customer energy usage and climate zones so that those customers who can benefit the most can be targeted for outreach. Outreach methods which can be used in support of this strategy include direct mailings to high energy users and customers living in climate zones with extreme temperature variations. Another strategy for reaching high use customers is to use demographics to locate low income areas where high usage is prevalent and conduct door-to-door canvassing in the area, while simultaneously enrolling customers in the program.

Additionally, SDG&E and SoCalGas leverage outreach of the LIEE program with the CARE program and community events held throughout their service territories, which is another effective method of reaching out to targeted areas. In 2006, SDG&E attended over 200 local community events which included presentations to community groups, governmental agencies, health and safety fairs, community resource fairs, and branch offices. SDG&E also leveraged its outreach for its low income programs with the utility's energy efficiency Residential Lighting Turn In Program which was targeted to hard to reach residential customers. In 2006, SoCalGas participated in 50 community events and

conducted 10 presentations within the community, providing information on all of its low-income programs.

**4) How can the LIEE application process be simplified to reduce customer confusion during the application process and to reduce the waiting period for LIEE installations?**

SDG&E and SoCalGas question KEMA's recommendation to "Continue to look for ways to simplify/streamline the application process," based on the finding that "Many households who are eligible for CARE and LIEE are already aware that the programs exist, but they are unwilling to participate because of what they find to be real (not just perceived) barriers to participation." KEMA Report, at p. 1-9. In customer satisfaction surveys conducted by both utilities over the past 3 years, a resounding 98% of customers surveyed state that the application process is very easy (80%) to somewhat easy (18%). Only 2% of customers surveyed found the application process somewhat difficult or very difficult. A major contributor to these high satisfaction levels is the fact that an outreach/energy specialist assists **every** customer through **every** aspect of the application process. No customer is required to apply without this one-on-one assistance.

The waiting period from the time a customer enrolls in the program until installations have been completed under the LIEE program has been a concern for both SDG&E and SoCalGas for some time. In an effort to improve many aspects of the LIEE program at both utilities, including time to install, a new database or workflow management system was implemented in June 2005 for SDG&E and in February 2007 for SoCalGas. SDG&E has seen a significant reduction in the waiting time customers experience between their initial enrollment in the program and until the time all of their measures have been installed and inspected. Since implementing its new system, SDG&E's average time to install has dropped from an average of 74-100 days in early 2005 down to 33 days in 2007. Since 2005, SoCalGas has averaged 28-29 days from customer sign date to the installation of LIEE measures.



**5) How can the LIEE program be modified to reduce the stigma some customers believe is associated with the program? Can documentation requirements be reduced?**

SDG&E and SoCalGas do not believe that the stigma associated with the LIEE program correlates to the documentation requirements or that the two questions are unrelated.

In response to the first question, SDG&E and SoCalGas make every effort to reduce any stigma that customers might perceive exists with respect to the LIEE program. Neither utility uses the LIEE name or “low-income” in its marketing materials. SDG&E utilizes the name Energy Team while SoCalGas utilizes the Direct Assistance Program (DAP) as the program name. Much of the outreach material used for increasing participation is focused around energy efficiency and the potential for energy savings. Additionally, qualification guidelines for participation are referenced as “income qualified” customers. The term “low income” is seldom used.

Even so, there are several stigma-related reasons that customers may not choose to participate in the LIEE program, some of which may prove to be insurmountable. Several common stigma-related reasons for customers not participating are:

- Perception that there are customers more needy than themselves that can benefit from the program;
- Perception that they do not qualify;
- Perception that neighbors or friends would think less of them if they participate in a “welfare” type program; and
- Perception that participation may lead to information being shared with various governmental areas agencies

Strategies to address the reasons why some customers do not participate in the LIEE program are currently being used by the utilities in their LIEE programs and include:

- Customer-assisted application process;
- Outreach using local community-based agencies;
- Targeting multi-family buildings and neighborhoods; and

- Emphasizing the energy efficiency savings from the program.

Regarding whether documentation requirements can be reduced, both SDG&E and SoCalGas have made significant strides in reducing document requirements for participation in the LIEE program by implementing a process to allow households located in neighborhoods with high saturations of low income customers to enroll via a self certification process. This process was developed in response to the Commission's request to increase customer participation during the Winter Initiative in November 2005. Subsequent to the conclusion of the Winter Initiative, the utilities sought and received permission from the Commission to continue their targeted self certification proposal. The Joint Utilities also enroll CARE-verified customers into their LIEE programs without requiring income documentation.

Reducing documentation requirements any further may lead to an unacceptable level of participation by customers who exceed the LIEE program's income limits. Given the limited amount of funds involved in serving LIEE customers, it is important to retain the balance of making the enrollment process as easy as possible with ensuring that those who receive services are eligible under program requirements. SDG&E and SoCalGas believe that the current process reasonably maintains this balance.

**6) How can education and training on the use of programmable thermostats be improved to assure more effective use of these technologies? Are there similar/other educational measures that need to be improved?**

SDG&E and SoCalGas believe that proper use of programmable thermostats is very important as any potential savings and is based on customer behavior and not the thermostat itself. Programmable thermostats have the potential to save energy only when the customer understands how to program and operate the thermostat. Strategies that could be used to assist customers more effectively use their programmable thermostats are as follows:

- Select one or two programmable thermostats that have basic functionality and are relatively easy to use to include in the program;
- At the time of installation, the installer can program the thermostat based on input from the customer; and

- The user manual for any thermostat used in the program can be made available in multiple languages.

An additional educational opportunity that SDG&E and SoCalGas recommend is a post installation energy education component that would be provided to customers who receive certain measures, including heating and/or cooling measures, refrigerators and lighting. Customers receiving these measures would receive additional instructions to reinforce proper use and maintenance of the installed measures and energy tips focused on changing poor energy efficiency habits. SDG&E and SoCalGas have also considered the feasibility of offering LIEE participants a program similar to the 20/20 Rebate Program offered by SDG&E in past years. Customers would receive measures capable of saving a pre-calculated number of kWh and/or therms. As an incentive, if customers can attain the savings levels for the 12 months immediately following program installation, they would receive a credit on their bill in an amount equal to a specified percent of their annual bill. The end goal of this program would be to make energy saving behaviors part of everyday life for LIEE customers and help prevent any potential “bounce back” of energy consumption which can occur as a result of initially lowering energy use. SDG&E and SoCalGas are considering this approach to energy education for future LIEE program planning.

**7) How can the utilities coordinate their low income programs with those of other regulated utilities and municipal utilities statewide?**

SDG&E and SoCalGas currently utilize various methods to coordinate their low income programs with other regulated utilities (e.g., SDG&E and SoCalGas, SoCalGas and SCE). The use of common contractors within the overlapping utilities’ service areas enables customers to receive all feasible natural gas and electric measures. The utilities also have various data sharing agreements enabling them to follow-up with those customers that may be eligible for their services. Additionally, the utilities are in frequent communication with one another to discuss the various components of the programs. This open line of communication enables the utilities to maintain consistency among the utility programs and discuss situations and potential solutions for day-to-day activities.

When possible, SoCalGas coordinates with the municipal utilities in its service area that offer LIEE programs to ensure the customer receives all available services. This coordination occurs as much as possible, given that the municipal utilities are not regulated by the CPUC and may have different objectives and procedures from the LIEE programs. SDG&E does not have a municipal utility serving its customers within its service territory.

**8) How can the utilities redesign their programs to assure that individual households do not receive measures that are not needed and do receive those that are?**

SDG&E and SoCalGas recommend that the LIEE program be designed to focus on those measures that provide energy and bill savings for low income customers. To assure that customers receive only measures that are truly needed and likely to result in energy savings, SDG&E and SoCalGas recommend implementing a customized program offering based on individual customer energy needs using a pre-installation home energy audit. This program redesign proposal moves away from a “one size fits all” model towards a custom offering based on energy consumption patterns, household characteristics, and climate zone.

The home energy audit would assess measures targeted for installation based on a list of eligible measures ranked by their cost effectiveness for each climate zone. This customized approach offers the customer the greatest energy and bill savings while ensuring program funds are utilized to support the most cost-effective measures. Other measures that support those selected, but do not provide significant energy savings alone, would also be installed. An important part of this audit approach is to educate customers on the use of any new energy efficient equipment as well as on the behavior changes necessary to save energy.

To ensure that only those measures needed are installed for each household, the home energy audit would be performed by a party different from the party installing the measures. Separating the home energy audit component from the installation of measures component would remove any potential conflict of interest when both functions are performed by one party.

**9) How can the utilities reduce the cost of locating eligible customers generally, and in particular, in neighborhoods that are remote or not predominantly low income? What are the prospects for joint marketing with other energy efficiency programs and California Alternative Rates for Energy?**

As discussed in the Joint Utilities' response to Q. 1. above, SDG&E and SoCalGas are currently developing, or have recently implemented, new outreach methods to maximize the number of enrollments in the LIEE program at the lowest cost possible. Reducing the cost of locating customers in neighborhoods that are remote or not predominantly low income is difficult, as locating these customers generally requires additional resources and marketing efforts. Targeted direct mail with follow-up phone calls to non-respondents is one means of reaching an area at a smaller cost. SDG&E and SoCalGas will continue to explore additional ways to leverage with organizations and service providers that have already established relationships with both remote and non-traditional low income customers as a means of reducing acquisition costs.

The Joint Utilities currently leverage their existing marketing efforts between CARE and LIEE, and CARE customers are specifically targeted in various LIEE focused marketing efforts. Joint marketing is generally not done with energy efficiency (EE) programs because LIEE customers often cannot afford the measures/appliances where rebates are offered. There are a few instances when joint marketing is done between LIEE and EE, such as SDG&E's Residential Lighting Exchange and Education Program and outreach and education efforts for energy efficiency programs.

**10) What other information or recommendations in the KEMA report provide insights about whether and how the utilities could improve LIEE programs?**

Generally, the Joint Utilities believe the KEMA Report provides insights into, and supports the Commission's investigation on how to better design the LIEE program around providing the most energy savings to low income customers at reasonable costs. Recommendations in the KEMA Report which address energy savings include, but are not limited to:

- Targeting high-benefit LIEE measures;

- Monitoring of savings from refrigerator replacement as the older stock is replaced;
- Developing creative and cost-effective ways to deliver greater and more immediate energy savings benefits; and
- Finding better, more efficient and less expensive ways to deliver energy saving measures.

The Joint Utilities believe that a program design which provides the most energy savings to customers is essential to a well-designed LIEE program and that the achievement of energy savings for customers should be a goal of the 2009-2011 program application process.

## **V. Joint Utilities' Response to Attachment A to the ALJ Ruling**

The Joint Utilities appreciate the Commission's assistance in identifying outreach issues and suggesting solutions. However, the Joint Utilities do not believe that prescribing precise methods of LIEE outreach to the investor-owned utilities (IOUs),<sup>4</sup> such as those in Attachment A to be an effective means of increasing enrollment in the program. The Joint Utilities currently employ most of the outreach methods described in Attachment A, as appropriate, managing the cost of outreach as effectively as reasonable. For example, the Joint Utilities employ the following outreach methods:

- Using direct mailings to reach targeted demographics and geographic areas;
- Enrolling customers in LIEE if they are CARE-verified customers without obtaining additional income documentation;
- Canvassing in low income neighborhoods;
- Assessing homes for the measures needed; and
- Leveraging outreach of the programs with Lighting Turn In community events, where customers also receive compact fluorescent light bulbs (CFLs) to help them reduce their energy use.

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<sup>4</sup> IOUS include SDG&E, SoCalGas, Pacific Gas and Electric Company (PG&E), and Southern California Edison Company (SCE).

The Joint Utilities work with the other IOUs, the Energy Division, and interested parties to identify new outreach strategies and methods for enrolling customers. To prescribe rules for outreach could limit creativity in implementing new methods and could become administratively burdensome for the Commission and the utilities. In addition, differences between and within service territories need to be taken into account, which can best be accomplished by the local utility at the program management level. The Commission should continue to provide a forum in which outreach and other program issues can be discussed and new ideas introduced. The utilities should continue to manage the outreach efforts within their service territories as effectively appropriate to their service territory and operations.

## **VI. Conclusion**

SDG&E and SoCalGas commend the Commission for its extensive work on the low income Needs Assessment and on program related issues. SDG&E and SoCalGas look forward to working with the Commission and interested parties to improve the LIEE programs under this Rulemaking in workshops and discussion and during the 2009-2011 program planning process.

Respectfully submitted,

\_\_\_\_\_/s/ Kim F. Hassan\_\_\_\_

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October 16, 2007

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of **JOINT COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY AND SOUTHERN CALIFORNIA GAS COMPANY ON THE ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENTS ON ISSUES RAISED IN THE KEMA REPORT AND ON NATURAL GAS APPLIANCES TESTING ISSUES** has been electronically mailed to each party of record of the service list in R.07-01-042. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and by depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to Administrative Law Judge Kim Malcolm and Commissioner Dian Grueneich.

Executed this 16<sup>th</sup> day of October, 2007 at San Diego, California.

/s/ Jenny Tjokro  
Jenny Tjokro



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[Top of Page](#)

[Back to INDEX OF SERVICE LISTS](#)